

Kate M. Baxter-Kauf
kmbaxter-kauf@locklaw.com
Direct: 612.596.4007



MINNEAPOLIS
Suite 2200
100 Washington Avenue South
Minneapolis, MN 55401-2179
T 612.339.6900
F 612.339.0981

June 9, 2020

VIA ECF AND E-MAIL

The Honorable Hildy Bowbeer, U.S.M.J.
United States District Court
734 Federal Building
316 N. Robert Street
St. Paul, MN 55101
Bowbeer_chambers@mnd.uscourts.gov

**Re: *In re EpiPen ERISA Litigation*, Case No. 17-cv-01884 (PAM-HB)
Interim Deadlines for Preparation of Joint Sealing Motion**

Dear Judge Bowbeer:

As discussed at the Case Management Conference last Monday, June 1, 2020, the parties have met and conferred regarding interim deadlines intended to facilitate the preparation and filing of the joint sealing motion due on July 31, 2020. *See* ECF No. 764. The parties respectfully submit the following memorialization of their agreement.

- **June 15, 2020.** Parties that filed under seal documents produced by a non-party will notify the non-party that the parties are preparing a joint motion regarding continued sealing pursuant to Local Rule 5.6(d)(2). Parties will invite the non-parties to provide their position on sealing and “reasons why documents should remain sealed” by July 8, 2020.
- **July 1, 2020.** Parties asserting “reasons why documents should remain sealed” will exchange their edits and revisions to that column of the joint motion.
- **July 8, 2020.** Non-Parties who opt to provide “reasons why documents should remain sealed” will provide any information they request the parties include in that column of the joint motion.

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- **July 22, 2020.** Parties asserting “reasons why documents should be unsealed” will exchange their edits and revisions to that column of the joint motion. As may be applicable, parties will also provide draft language for the column requiring identification of areas of agreement/disagreement.
- **July 24, 2020.** Parties will meet & confer regarding disputes and steps necessary to finalize the joint motion.
- **Week of July 27, 2020.** Parties will exchange further revisions and meet & confer as necessary.
- **July 31, 2020.** Parties will finalize and file the joint motion.

This letter is hereby filed on behalf of and with permission of all parties, with permission from chambers. Please let us know if the Court has any questions.

Very truly yours,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.



Kate M. Baxter-Kauf